BORSARI & PAXSON

ATTORNEYS & COUNSELLORS AT LAW
5335 WISCONSIN AVENUE, N.W.
SUITE 440
WASHINGTON, D.C. 20015

GEORGE R. BORSARI, JR.
ANNE THOMAS PAXSON

FACSIMILE NUMBER
(202) 296-4460

TELEPHONE NUMBER
(202) 296-4800

November 16, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, N.W.
Washington, DC 20554

Re: National Translator Association
Comments in WT Docket No. 10-153

Dear Ms. Dortch:

Transmitted herewith, on behalf of the National Translator Association ("NTA"), are its Comments in WT Docket No. 10-153. Should any question arise concerning this matter, please communicate directly with the undersigned.

Respectfully submitted,

BORSARI & PAXSON

/s/ George R. Borsari, Jr.

George R. Borsari, Jr.
General Counsel for the
National Translator Association

NATIONAL TRANSLATOR ASSOCIATION

OUR AIM – TO PROVIDE FM and TV SIGNALS in EVERY HOME

Office of the President, 2355 Ranch Dr., Westminster, CO 80234 303-465-5742 stcl@comcast.net

Statement of the National Translator Association Regarding TV Translators using BAS Frequencies

The membership of the National Translator Association (NTA) is made up of the people and organizations that own and operate the nearly 5000 rebroadcast TV translators and FM translators. The Association is dedicated to the provision of free over-the-air TV and FM to all areas that do not receive adequate coverage from a full compliment of primary stations.

Operators of TV translators are authorized to use "TV translator relay stations" operating on BAS frequencies to relay input signals to TV translators. [1]

In the event the Commission "repacks" and reduces the amount of spectrum assigned to broadcast TV, many translator systems will be unable to maintain the separation between input frequencies and output frequencies. See Exhibit 1. It will be increasingly necessary to use BAS microwave signal delivery to bring input signals to TV translators. For this reason having our typical mode of operation recognized in the rules is important to us.

It has become common practice to relay broadcast station generated 8VSB digital signals by BAS microwave, preserving the 7VSB modulation. This has the advantage that the output of the microwave receiver can go directly into the translator without demodulation or remodulation anywhere in the chain. Typically frequencies corresponding to TV channels 3, 4 & 5 which are within the microwave IF can be transported and delivered from the microwave receiver. The translator converts this signal to its final translator output frequency in the normal manner.

Translator operators have found that it is entirely practical to insert their 8VSB signals into the microwave IF and transport three primary stations with one set of microwave equipment.

[1] 74.601(d).

We have become accustomed to using 6, 12 or 18 MHz of microwave bandwidth with loading payloads as follows.

Transported Primary Stations	Bandwidth	Loading Payload Megabits/sec
1	6	19.4
2	12	38.8
3	18	58.2

We request that these bandwidth and corresponding "Loading payloads" be included in appropriate tabulations of available frequencies.

Respectfully submitted,

Dr. Byron W. St. Clair
President
November 9, 2010

Typical Multi - Channel Multi – Repeat Translator System

Systems typically carry six primary stations but systems exist with up to nine. Three to four transmissions are common but systems with seven retransmissions are in operation. With digital television the signal can be regenerated at each repeat and there is no signal degradation with multiple repeats.

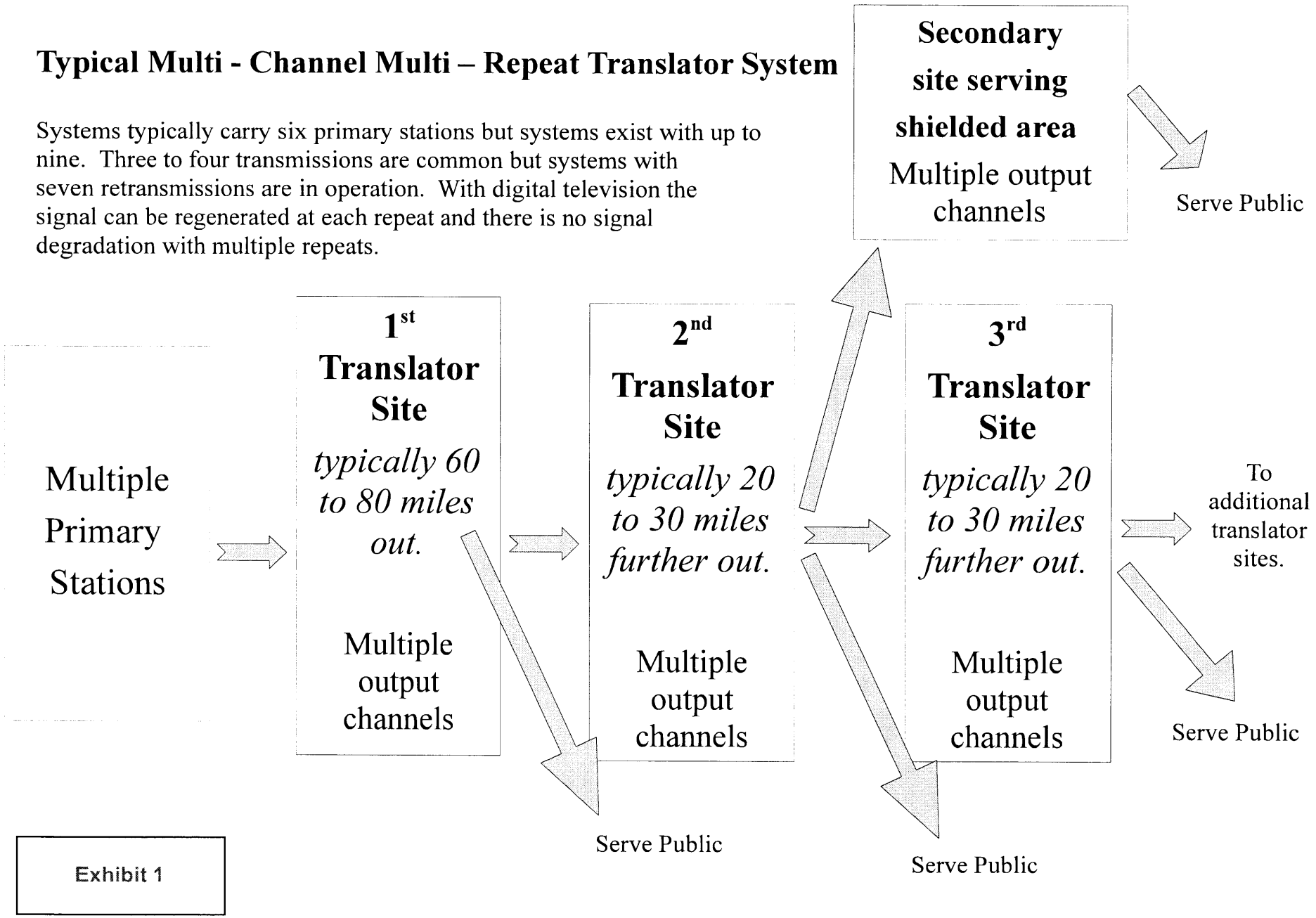

Exhibit 1